

1 LABATON KELLER SUCHAROW LLP
2 Thomas A. Dubbs (*pro hac vice*)
3 Carol C. Villegas (*pro hac vice*)
3 Michael P. Canty (*pro hac vice*)
4 Thomas G. Hoffman, Jr. (*pro hac vice*)
4 140 Broadway
5 New York, NY 10005

5 *Lead Counsel to Securities Lead Plaintiff
6 and the Class*

7 MICHELSON LAW GROUP
8 Randy Michelson (SBN 114095)
8 220 Montgomery Street, Suite 2100
9 San Francisco, CA 94104

9 *Local Bankruptcy Counsel to
10 Securities Lead Plaintiff and the Class*

LOWENSTEIN SANDLER LLP
Michael S. Etkin (*pro hac vice*)
Andrew Behlmann (*pro hac vice*)
Scott Cargill (*pro hac vice*)
Colleen Restel
One Lowenstein Drive
Roseland, NJ 07068

Special Bankruptcy Counsel to
Securities Lead Plaintiff and the Class

Additional counsel listed on Exhibit A

11
12 UNITED STATES BANKRUPTCY COURT

13 NORTHERN DISTRICT OF CALIFORNIA

14 SAN FRANCISCO DIVISION

15 In re:) Case No. 19-30088 (DM) (Lead Case)
16 PG&E CORPORATION)) Chapter 11
17 - and -)) (JOINTLY ADMINISTERED)
18 PACIFIC GAS AND ELECTRIC COMPANY,)) NOTICE OF APPEARANCE AND
19)) REQUEST FOR NOTICE
20 Debtors.)) United States Bankruptcy Court
20 _____)) Courtroom 17, 16th Floor
21)) San Francisco, CA 94102

21 Affects Both Debtors

22 Affects PG&E Corporation

23 Affects Pacific Gas and Electric Company

24

25

26

27

28

1 PLEASE TAKE NOTICE that Willow E. Radcliffe and Kenneth J. Black of Robbins Geller
2 Rudman & Dowd LLP hereby provide their Notice of Appearance as counsel on behalf of: (a) York
3 County on behalf of the County of York Retirement Fund; (b) City of Warren Police and Fire
4 Retirement System; and (c) Mid-Jersey Trucking Industry & Local No. 701 Pension Fund (the
5 "Securities Act Plaintiffs") in the above-captioned case (the "Chapter 11 Cases") pursuant to
6 Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"). The noticing
7 attorneys hereby request that copies of all notices and pleadings given or filed in the Chapter 11
8 Cases be given and served upon them at the following address, telephone and facsimile numbers, and
9 email addresses and that Robbins Geller Rudman & Dowd LLP be added to the mailing matrix on
10 file with the Clerk of the Bankruptcy Court as follows:

11 ROBBINS GELLER RUDMAN &
12 DOWD LLP
13 WILLOW E. RADCLIFFE (200087)
14 KENNETH J. BLACK (291871)
15 Post Montgomery Center
16 One Montgomery Street, Suite 1800
San Francisco, CA 94104
Telephone: 415/288-4545
415/288-4534 (fax)
willowr@rgrdlaw.com
kennyb@rgrdlaw.com

17 PLEASE TAKE FURTHER NOTICE that, pursuant to §1109(b) of the Bankruptcy Code, the
18 foregoing request includes not only the notices and papers referred to in the Bankruptcy Rules and
19 sections specified above but also includes, without limitation, all orders, notices, applications,
20 complaints or demands, motions, petitions, pleadings or requests, disclosure statements or plans of
21 reorganization, whether formal or informal, written or oral, and whether transmitted or conveyed by
22 mail, email, hand or courier delivery, telephone, telecopy, facsimile, telegraph or otherwise, in the
23 Chapter 11 Cases and proceedings therein.

24 PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and any subsequent
25 appearance, pleading, claim, or suit made or filed by the Securities Act Plaintiffs, either individually
26 or for any proposed class or any member thereof, does not, shall not, and shall not be deemed to:
27 (i) constitute a submission by the Securities Act Plaintiffs, either individually or for any proposed
28 class or any member thereof, to the jurisdiction of the Bankruptcy Court; (ii) constitute consent by

1 the Securities Act Plaintiffs, either individually or for any proposed class or any member thereof, to
2 entry by the Bankruptcy Court of any final order in any non-core proceeding, which consent is
3 hereby withheld unless, and solely to the extent, expressly granted in the future with respect to a
4 specific proceeding; or (iii) waive any substantive or procedural rights of the Securities Act Plaintiffs
5 or any proposed class or any member thereof, including, but not limited to: (a) the right to challenge
6 the constitutional authority of the Bankruptcy Court to enter a final order or judgment on any matter;
7 (b) the right to have final orders in non-core matters entered only after *de novo* review by a United
8 States District Court judge; (c) the right to trial by jury in any Chapter 11 Cases, including all
9 adversary proceedings and other related cases and proceedings (collectively, the “Related
10 Proceedings”), in the securities class action captioned *In re PG&E Corp. Sec. Litig.*, No.
11 5:18-cv-03509-EJD (the “Securities Litigation”), or in any other case, controversy, or proceeding
12 related to or arising from the Debtors, the Chapter 11 Cases, any Related Proceedings, or the
13 Securities Litigation; (d) the right to seek withdrawal of the bankruptcy reference by a United States
14 District Court in any matter subject to mandatory or discretionary withdrawal; or (e) all other rights,
15 claims, actions, arguments, counterarguments, defenses, setoffs, or recoupments to which the
16 Securities Act Plaintiffs, any proposed class or any member thereof are or may be entitled under
17 agreements at law, in equity, or otherwise, all of which rights, claims, actions, arguments,
18 counterarguments, defenses, setoffs, and recoupments are expressly reserved, nor shall this request
19 for notice be deemed to constitute consent to electronic service of any pleading or paper for which
20 mailed or personal service is required under any applicable law.

21 DATED: September 10, 2024

ROBBINS GELLER RUDMAN
& DOWD LLP
WILLOW E. RADCLIFFE
KENNETH J. BLACK

24
25 s/ Willow E. Radcliffe
26
27
28
WILLOW E. RADCLIFFE

1 Post Montgomery Center
2 One Montgomery Street, Suite 1800
3 San Francisco, CA 94104
4 Telephone: 415/288-4545
415/288-4534 (fax)

5 Counsel for the Securities Act Plaintiffs
6 – and –

7 MICHELSON LAW GROUP

8 Local Bankruptcy Counsel to Securities Lead
9 Plaintiff and the Class

10 – and –

11 LOWENSTEIN SANDLER LLP

12 Special Bankruptcy Counsel to Securities Lead
13 Plaintiff and the Class

14 – and –

15 ADAMSKI, MORISKI, MADDEN,
16 CUMBERLAND & GREEN LLP

17 Liaison Counsel for the Class

18 – and –

19 LABATON KELLER SUCHAROW LLP

20 Lead Counsel to Securities Lead Plaintiff and the
21 Class

22 – and –

23 VANOVERBEKE, MICHAUD & TIMMONY, P.C.

24 Additional Counsel for the Securities Act Plaintiffs

EXHIBIT A
COUNSEL

LABATON KELLER SUCHAROW LLP
Thomas A. Dubbs (*pro hac vice*)
Carol C. Villegas (*pro hac vice*)
Michael P. Canty (*pro hac vice*)
Thomas G. Hoffman, Jr. (*pro hac vice*)
140 Broadway
New York, NY 10005
Telephone: 212/907-0700
tdubbs@labaton.com
cvillegas@labaton.com
mcanty@labaton.com
thoffman@labaton.com

*Lead Counsel to Securities Lead Plaintiff
and the Class*

LOWENSTEIN SANDLER LLP
Michael S. Etkin (*pro hac vice*)
Andrew Behlmann (*pro hac vice*)
Scott Cargill (*pro hac vice*)
Colleen Restel
One Lowenstein Drive
Roseland, NJ 07068
Telephone: 973/597-2500
Facsimile: 973/597-2333
metkin@lowenstein.com
abehlmann@lowenstein.com
scargill@lowenstein.com
crestel@lowenstein.com

*Special Bankruptcy Counsel to
Securities Lead Plaintiff and the Class*

19 ROBBINS GELLER RUDMAN &
DOWD LLP
20 Darren J. Robbins (SBN 168593)
65 West Broadway, Suite 1900
21 San Diego, CA 92101
Telephone: 619/231-1058
22 Facsimile: 619/231-7423
darrenr@rgrdlaw.com
23 bcochran@rgrdlaw.com

24 VANOVERBEKE, MICHAUD &
25 TIMMONY, P.C.
26 Thomas C. Michaud
79 Alfred Street
27 Detroit, MI 48201
Telephone: 313/578-1200
tmichaud@vmtlaw.com

ADAMSKI, MORISKI, MADDEN,
CUMBERLAND & GREEN LLP
James M. Wagstaffe (SBN 95535)
100 Pine Street, Suite 2250
San Francisco, CA 94111
Telephone: 415/254-8615
wagstaffe@ammclaw.com

*Liaison Counsel for Securities Lead Plaintiff
and the Class*

MICHELSON LAW GROUP
Randy Michelson (SBN 114095)
220 Montgomery Street, Suite 2100
San Francisco, CA 94104
Facsimile: 415/512-8601
randy.michelson@michelsoonlawgroup.com

*Local Bankruptcy Counsel to
Securities Lead Plaintiff and the Class*

ROBBINS GELLER RUDMAN &
DOWD LLP
Willow E. Radcliffe (SBN 200089)
Kenneth J. Black (SBN 291871)
Hadiya K. Deshmukh (SBN 328118)
Post Montgomery Center
One Montgomery Street, Suite 1800
San Francisco, CA 94104
Telephone: 415/288-4545
Facsimile: 415/288-4534
willowr@rgrdlaw.com
kennyb@rgrdlaw.com
hdeshmukh@rgrdlaw.com

Counsel for Securities Act Plaintiffs

Additional Counsel for Securities Act Plaintiffs